



OFFSHORE OPERATORS COMMITTEE

October 16, 2001

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, VA 20170

Attention: Rules Processing Team (RPT)

30 CFR 250
66 FR 37611; July 19, 2001
Document Incorporated by Reference
American Petroleum Institute
Specification 2C for Offshore
Cranes (API Spec 2C)

Gentlemen:

The Offshore Operators Committee (OOC) appreciates the opportunity to provide written comments on the proposed rulemaking to incorporate by reference the Fifth Edition of the American Petroleum Institute's Specification for Offshore Cranes (API Spec 2C) into Minerals Management Service (MMS) regulations.

The OOC is a trade organization of 107 members and associates that represents virtually all of the oil and gas production in the Gulf of Mexico (GOM). OOC comments are made without prejudice to any member's right to have or express different or opposing views.

The OOC commends the MMS for incorporating industry standards into its offshore operating regulations to improve safety on the OCS. However, OOC is concerned about the impact of this regulation on existing OCS cranes (i.e., transition time and capability to equip with anti-two block safety device) and also with the significant administrative burden increase associated with maintaining crane records. The attached comments and responses to the questions included in the MMS proposal represent a consolidated summary of the companies participating in the review of the proposed rule. Individual companies may also be submitting comments addressing this rulemaking.

If you have any questions or need additional information regarding these comments, contact the undersigned at 504-561-2427 or Steve Brooks at 504-561-4753.

Yours Truly,

Allen J. Verret
Executive Director
Offshore Operators Committee

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Comments to Questions

- a) **Will the addition of API Spec 2C to MMS's documents incorporated by reference increase safety and safe operations on the OCS?**
- Yes. API Standards are published to facilitate the broad availability of proven, sound engineering and operating practices. API Spec 2C is already widely recognized as an industry standard and also is incorporated by the USCG into its regulations.
- b) **Are there other standards for offshore cranes that may be appropriate for MMS to incorporate as part of MMS's regulations?**
- We do not have knowledge of any.
- c) **When should MMS require all cranes on OCS fixed platforms to be fully compliant with API Spec 2C?**
- All new cranes should be compliant effective immediately. Cranes not originally built to API Spec 2C should be grandfathered since they may not be able to be upgraded to the standard (material traceability, design records, manufacturer out of business, etc.).
- d) **Is a 1-year transition period enough time for industry to comply with the change proposed in § 250.108(c)?**
- No. The transition period will depend on the number of cranes to be equipped, material availability, scheduling, etc. OOC recommends a minimum of 2 years to allow for a systematic approach.
- e) **Should MMS establish a requirement similar to the U.S. Coast Guard (USCG), which requires cranes to be installed according to an approved crane plan and inspected and load tested by an Agency-approved third party when the crane is installed?**
- No. API RP 2D already adequately addresses requirements for new crane installations.
- f) **Should MMS require all new cranes for installation on OCS fixed platforms to have an API monogram on the nameplate of the crane as evidence of certification of the anti-two block safety device?**
- Yes. Manufacturers who apply the API trade / service mark to the nameplate are warranting that they have an API license, that the construction on the crane complies in all details to API Spec 2C, (not limited to anti-two block control

devices) and that they have a quality control system which conforms to API Specification Q1.

- g) **Should a rental crane that is installed on OCS fixed platforms be considered a new crane and, therefore, be required to be fully compliant with API Spec 2C?**
- All new rental cranes should be compliant effective immediately. However, rental cranes not originally built to API Spec 2C may not be able to be brought to that standard. It is suggested that a minimal requirements for existing cranes be specified (i.e., anti-two block, high angle kickout, static/dynamic load chart).
- h) **Should MMS limit the type of anti-two block devices that are acceptable? What are the known failure rates of the different types?**
- No. API Spec 2C (12.6) addresses anti-two block by specifying that a means shall be provided to protect hoist ropes, structural components and machinery from damage which may occur when two sheave groups (i.e., load block and boom head) come into contact as the hoist cable is drawn in. A control override device or proximity warning device may be used. Stalling of the hoist drum is acceptable where damage or loss of control would not result. It is recommended that the MMS rule should incorporate the standard in it's entirety as written. OOC is not aware of failure rates for different types of anti-two block devices.
- i) **Should MMS consider an additional cost factor for retrofitting existing cranes with the anti-two block safety device (i.e., an associated cost for the amount of time a crane is expected to be out-of-service while it is being retrofitted?)**
- Yes. All costs associated with retrofitting cranes should be considered. Additionally, it is estimated that the cost to retrofit a hydraulic system crane could be as much as \$7000.

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Other Comments

30 CFR 250.108 (c) - As noted in the response to question (d), a minimum transition period of 2 years should be included in the rule.

30 CFR 250.108 (d)(2) - This requirement would create a significant paperwork and administrative burden on operators. Presently API Spec 2C requires the crane manufacturer to maintain all their inspection and testing records for 20 years, but no design and construction records. Also, API RP 2D specifies that inspection and maintenance records be kept by the operator for 2 years. Keeping all these records for the life of the crane at the facility would require a substantial effort and all records for existing cranes may not exist. It is recommended that MMS continue to follow the existing requirements in API RP 2D and API Spec 2C. Any new records retention requirements should be limited to installation records for any cranes retrofitted with anti-two block safety devices.